

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	Criminal No. 15-626 (WJM)
v.	<u>Filed Electronically</u>
TIMOTHY LIVINGSTON	<b>Declaration of Ansel Halliburton in Support of Defendant's Motions <i>in Limine</i></b>
Defendant.	

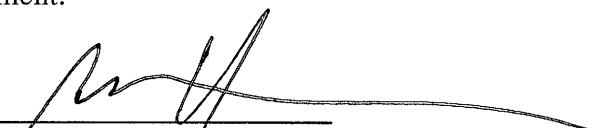
Ansel Halliburton, of full age, certifies that:

1. I am an attorney at law of the State of California, and have been retained to represent Timothy Livingston in the above captioned matter and as such I am fully familiar with the facts related to this case.
2. The document attached as Exhibit 1 is a true and correct copy of Trial Exhibit 7011 as received from the Government.
3. The document attached as Exhibit 2 is a true and correct copy of Trial Exhibit 7012 as received from the Government.
4. The document attached as Exhibit 3 is a true and correct copy of Trial Exhibit 2020 as received from the Government.
5. The documents attached as Exhibits 4–10 come from Trial Exhibit 4001, as received from the Government. Trial Exhibit 4001 was delivered by the Government to the defense as a set of numerous computer files, including approximately 40,000 email files. I provided the full contents of Trial Exhibit 4001 to Mr. Livingston's technical expert, Matthew Edman of Berkeley Research Group, on October 10, 2016.

6. A rendered version of the file “uce.2016042418.028286.eml” from Trial Exhibit 4001, and referenced in Mr. Livingston’s motions *in limine*, is attached hereto as Exhibit 4.  
  
This email contained two additional emails as attachments, and rendered version of these attached emails are attached hereto as Exhibits 5 and 6.
7. A rendered version of the file “uce.2015111012.020599.eml” from Trial Exhibit 4001, and referenced in Mr. Livingston’s motions *in limine*, is attached hereto as Exhibit 7.  
  
This email contained numerous additional emails as attachments. Rendered versions of two of these attached emails are attached hereto as Exhibits 8 and 9.
8. A rendered version of the file “uce.2013070803.011501” from Trial Exhibit 4001, and referenced in section II.C.a.ii of Mr. Livingston’s motions *in limine*, is attached hereto as Exhibit 10.
9. On August 22, 2016, the Government provided to the defense an expert disclosure relating to John R. Levine. True and correct copies of that disclosure the accompanying CV are attached hereto as Exhibits 11 and 12.
10. Exhibits 4–10 have been converted into a printable form, but have not been otherwise modified.
11. I have additionally redacted certain exhibits in keeping with the Protective Order in this case. Otherwise, they are as the Government produced them to the defense.

I certify that the foregoing statements made by me are true and that if any of the statements are willfully false, I am subject to punishment.

Dated: October 20, 2016

  
Ansel Halliburton, Esq.,  
Attorney for Timothy Livingston